

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TSD FACILITIES - PART A

Date of Inspection 07/10/96 Time start 10:30 am Time finish 11:00 am
Name of Inspector David A. Althoff Jr.
Company, installation name Litten Business Systems.
Location 601 Loucks mill Rd.
County York Municipality Spring Garden
Identification number PAD 098737794
Name of responsible official Patrick J. Hepner
Title Supervisor Environmental Affairs
Mailing Address 1 Gatehall Drive Parsippany NJ 07054-4514
Area code and telephone number 201-455-0606
Name of person interviewed Mac Sentz
Title Caretaker
Mailing address (if different from above) 601 Loucks mill Rd
Area code and telephone number 717 845-7450

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological
b. ☐ Storage - ☐ containers ☐ tanks ☐ surface impoundments ☐ waste piles
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

Some Non routine Generation may occur from onsite Contamination assessment

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

Sitename Litton/Cole
ID Number PAD09737794
Date 7/10/96

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Waste Management
Inspection Report Comments

The Department conducted an inspection at the closed Cole Steel Plant owned by Litton Business Systems. Present for this inspection for the Department was David Althoff Jr. Present for Litton was Mac Sentz. The purpose of this inspection was to inspect the property for Hazardous Waste TSD activity. The Department observed that the facility was closed with no current activity. The Department observed two 55-gallon drums in the north courtyard which were beside two well drillings. These drums appeared to contain an unidentified material. The Department recommends that any 55-gallon drums onsite be labeled so as to accurately identify their contents.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date _____

Inspector (Signature) _____

Date 7-26-96

LITTON BUSINESS SYSTEMS

Inspection Report/Data Entry

-Col-

Site I.D. # PAD098737794
 Site Name Cole Office Bldg.
 Address 601 Loucks Mill Rd
York PA 17405
 Municipality Spring Garden Twp
 Responsible Official Bill McClain
 Person Interviewed "
 Inspector K. Allierici

Telephone # 845-1545
Operator Name Cole Office Equip - Joyce International
Address 640 Whitford Rd P.O. M-26
York PA 17405
County York
Title Plant manager
Title _____
Time 10:30-1:00

Date	Inspection Date	Inspection Type	Facility Type	Inspector I.D. #	# Violation
	07/30/00	04		2338	

[illegible]

Sample # Low

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 Sample # High

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Monitoring Points Sampled

[illegible]

INSPECTION TYPE

FACILITY TYPE

		Municipal	Residual	Hazardous
01 Routine	10 Survey	01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Spill Response	11 Part B	02 Construction/Demolition	07 Demolition	02 Treatment
03 Remedial Action	12 Complaint	Landfill	08 Processing	03 Storage
04 Follow Up	13 Withdrawn	03 Processing	09 Incinerator	04 Transporter
05 Crit Stage	14 Closure	04 Incinerator	10 Surface Application	05 Permit by Rule
06 Sample Only	15 Post Closure	05 Surface Application	11 Surface Impoundment	06 Generator
07 Permitting	16 Form 4		12 Surface Injection Well	07 SQG
08 Superfund	17 Form 4 w/sample			08 RRR
09 Ground Water	50 Record Rev			09 Other
	99 Other			50 Superfund

Inspection Report Comments

Date of Inspection July 30, 1990 Identification Number PAD098737794
Company/Facility/Site Name Cole Office Env. Leach Mill Id

- Arrived on site 10:30 accompanied by Tom Harlow DER
Bill McClain, Cole Office Env. This is a follow up
inspection to monitor progress of close-out.
- Paint remains on site. According to Mr. McClain,
Sherron Williams will be picking up this paint.
Mr. McClain stated that a contract with Sherron Williams
will be resolved by the end of the week.
 - Paint-room - Water is covering paint area to remove
water based paint. According to Mr. McClain,
this will be pumped out, tested and disposed
of.
 - Drum on site for rags from clean-up.
 - Phosphate treatment area - tanks have been removed.
 - Manifest and quarterly reports were checked during this
inspection. No land ban notifications were observed
for manifests PAC 2110835 6/6/90 F005, F003 and PAC 211091
5/30/90 F005/F003 waste to Berkey products.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Person Interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

Page 2 of 2

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection July 30, 1990 Identification Number PA D098 737794Company/Facility/Site Name Cole Office Environments, Louch Mill Rd

- almost all machinery, desks, cabinets, have been removed from the facility

- Containment area for drums is empty and awaiting final clean-up Fronted Chemicals and Buehart - Home have been returned by Cole office for close-out of the containment area.

Mr McClain has agreed to contact the Department when closing is finished.

Left site app. 1:00

The Department recommends that land ban notifications be submitted with all wastes as necessary by the Rules and Regulations of the Department and EPA

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Person Interviewed (signature) _____ Date _____

Inspector (signature) Theresa M Alberici Date Sept 17, 1990Page 2 of 2

Inspection Report/Data Entry

Telephone # 845-1545
Operator Name Colo Office Env - Joyce Intern
Address 640 Whiteford Rd Box M-26
York PA 17405
County York
Title _____
Title Plant mng
Time 10:45-1:00

Sample # Low

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 Sample # High

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FACILITY TYPE

		Municipal	Residual	Hazardous
01 Routine	10 Survey	01 Municipal Waste Landfill	06 Landfill	01 Disposal
02 Spill Response	11 Part B	02 Construction/Demolition	07 Demolition	02 Treatment
03 Remedial Action	12 Complaint	Landfill	08 Processing	03 Storage
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07 Permitting	16 Form 4		12 Surface Injection Well	07 SQG
08 Superfund	17 Form 4 w/sample			08 RRR
09 Ground Water	50 Record Rev			09 Other
	99 Other			50 Superfund

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection July 5, 1990 Identification Number PA DO 9873794
 Company/Facility/Site Name Cole Office Env., Loughs Well Road, York PA

Arrived on site at 10:45. Accompanied by Tom Karlov, DEC and Bill McClain, Plant Manager Cole Office Environment. In March, 1990, Cole notified the Department with the 180-day notice of closure. The purpose of this inspection was to monitor close out procedures being taken by Cole Office Env.

According to Mr. McClain the facility is closed. The majority of hazardous waste has been shipped off-site for disposal and the majority of machinery, desks, cabinets, etc. has been sold at auction. Mr. McClain stated that Cole Office Env. leased the buildings from Litter Co from 1984 - 1990. Once the buildings are vacated by Cole, Litter will resume responsibility for buildings.

Mr. McClain continued to explain that both Cole facilities in York are closed and in the process of vacating the premises.

While on site, both inside and outside of the ~~facility~~ buildings were inspected. The following items were noted during the inspection: 1. Majority of buildings are empty.

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Inspector (signature) _____ Date _____

Page 1 of 3

Inspection Report Comments

Date of Inspection July 5, 1990 Identification Number PA D098737794TMCompany/Facility/Site Name Cole Office Environments, Loucks Mill Rd, York

2. Contractors were on site to collect furniture, machinery etc sold at auction.
3. Phosphate washing areas - tanks have been pumped off, a trace amount of material remains at the bottom of each tank. Mr McClain stated that the tanks were scheduled to be cleaned out and removed.
4. Phosphate treatment area - tanks have been pumped out and are awaiting final clean up.
5. App 22 drums of water-based paint are awaiting removal by Sherman-William's (drums are located by paint area)
6. Paint area is ~~to be cleaned up~~ ^{or} ~~needs to be cleaned up~~. Awaiting clean up according to Mr McClain, the paint that remains in this area will be pumped into containers and where possible, will be returned to Sherman-William's to be removed and used in the Cole plant in Canada.
7. App 200 drums of paint awaiting shipment to Sherman-William's. These drums are located outdoors. ~~by~~ This paint will be removed (if necessary) and used in Cole Office Env in plant in Canada.
8. 3 drums, located indoors, contained various material.

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Inspector (signature) _____ Date _____

Page 2 of 3

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection July 5, 1990 Identification Number PAD09873 7794
Company/Facility/Site Name Cite Office Environment, Loucks Hill Rd, York

1 drum contains unknown material, 1 contains material labelled "adhesives" and 1 contains 5-7 gallons of paint. According to Mr McClain these materials will be characterized and disposed of accordingly.

9. Container storage area repaired and moved away from buildings. No paperwork was inspected during this inspection. All paperwork was locked in the safe and Mr McClain could not get into safe at the time of this inspection.

Mr McClain agreed to arrange a meeting with the Department to go over paperwork and to arrange for a final close-out inspection.

Left site app 1:00

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Inspector (signature) Theresa M Alberici Date Sept 17 1990

Page p 3 of 3



PAD 09873 7794 LITTON-BUSINESS

ER-WM-300: Rev. 12/88

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

SYSTEMS - 001

Hazardous Waste Inspection Report
Generators - Part A

TSD

Date of inspection 9/6/89 Time start 12:35 pm Time finish 4:00 pm
Name of inspector Theresa Alberici, Tom Harlan, Jo Anne Palaski
Company, installation name Cole Office Environment
Location 601 Loucks mill Rd York PA
County York Municipality Spring Garden
Identification number PA D092737794
Name of responsible official David Johnson
Title President
Mailing address 640 Whiteford Rd York 17405
Area code and telephone number 854 - 1545 (717)
Name of person interviewed Ed Falkenstein
Title waste water supervisor
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☒ storage, ☐ disposal ☒ PBR *currently listed as a PBR*
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☐ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 2750 gals kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
FOO 2 (liquid) D002	Enviroite Corporation	1600 PA Ave, York PA
FOO 5	Berkley Products Co	405 South 7th ST AKRON PA 17521
FOO 3	"	"
D001	Frontier Chemical Waste Process Inc	4626 Royal Ave Niagara NY 14303
D001/ FOO 1	"	→ come time only
FOO 6	Waste Conversion Inc	2861 Sandstone Rd Hatfield - one time only

Hazardous Waste Inspection Report Generators – Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	Chapter Citation
Status				R E Q U I R E M E N T			75.262
1	2	3	4				
X				Hazardous waste determination, copies available			(b)
X				Identification number			(c)(1)
X				Hazardous waste shipments offered only to licensed transporters			(c)(4)
		X		Authorization received from TSD facility for wastes shipped off-site			(d)
X				PA manifest used for intrastate shipments			(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments			(e)(3)
X				Manifests filled out properly and completely			(e)(7)
X				Manifests routed properly and within time limits (7 days)			(e)(14) or (15)
X				Proper U.S. DOT shipping containers or packages			(f)(1)(i)
		X		Shipping containers marked and labeled according to U.S. DOT			(f)(1)(ii)
		X		Containers of 110 gal. or less marked with required PA label			(f)(1)(iii)
		X		Placards offered to transporter <i>no waste shipped off-site during this inspection</i>			(f)(2)
X				Wastes accumulated on-site for less than 90 days			(g)(1)(i)
			X	Wastes stored in proper containers and properly marked and labeled <i>see comment</i>			(g)(1)(ii)
			X	Containers managed in accordance with 75.265(q)(1)-(4) <i>see comment</i>			(g)(1)(iii)
			X	Containers clearly marked with accumulation date and visible for inspection <i>see comment</i>			(g)(1)(iv)
		X		Records retained at designated location for 20 years			(h)
		X		Quarterly reports submitted to the Department			(i)
X				Exception reporting procedures followed			(j)
	X			Hazardous waste disposal plan, if required			(l)
		X		Spill reporting procedures followed			(m)(1)
			X	Preparedness, Prevention and Contingency Plan and implemented <i>see comment</i>			(m)(5)
	X			Special requirements followed for international shipments			(o)
			X	On the job or classroom personnel training program (75.265(f)) <i>see comment</i>			(g)(1)(6)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)			(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9/6/89 Identification Number PAD 092 737794
 Company, Installation Name Cole Office Env
 County York Municipality Spring Garden

Accompanied on inspection by JoAnne Palaski, Tom Harlow from DER and Ed Falkenstein, Cole Office Environment Waste Water Supervisor. Arrived on site 12:35 pm on 9/6/89.

Cole Office Env is currently listed as a permit-by-rule facility. ~~However~~ due to the treatment of waste from a zinc-chrome electroplating operation. However, during this inspection, it was noted that the zinc-chrome electroplating operation has closed. According to Mr. Falkenstein, this operation closed in November of 1987.

75.262

(g)(1)(ii); (g)(1)(iv) Several containers of hazardous waste - waste paint drums - had no labels or date of accumulation.

Department recommends that all hazardous waste containers be labelled in accordance with regulations to accurately depict contents and date of accumulation.

75.262 (g)(1)(iii) refers to 75.262(g)(1-14)

— several containers of hazardous waste ~~had~~ had open bungs and/or open tops -

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Person Interviewed (signature) _____ Date _____
 Inspector (signature) Theresa Alberici Date 10/10/89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9/6/89 Identification Number PA D09813 7794
 Company, Installation Name Cole Office Bldg
 County York Municipality Spring Garden

open humps found on several containers tops,
 open tops found on containers of ~~the~~ waste paint.

- container storage area-outdoor area - cracks
 in base

- 400 waste drums in outdoor area, stored 450 ft from building

- indoor - area where hazardous waste stored - drum
~~located~~^{located} next to a square pit ~~with~~ app.
 1' x 1' x 6" that appeared to have dirt bottom
 Mr Falkenstein was not aware of where pit lead.

- spent solvent used in flushing ~~the~~ paint line is
 transported by pipe to drum for storage and
 ultimate disposal. Solvent leaked/sprayed
 from pipe as enters drum

including
 75.262(m)(5) PPC plan incomplete: ~~the plan is incomplete~~
 but at least list of equipment but no locations, inadequate
 evacuation, description and directions

75.262(g)(6)(c) training program. 2 names were listed
 as receiving formal training. In speaking with Mr.
 Falkenstein, ~~it appeared that additional employees~~^{employees}

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Person Interviewed (signature) _____ Date _____

Inspector (signature) Theresa Alberici Date 10/10/89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9/6/89 Identification Number PAD 098737794
Company, Installation Name Cole Office Env
County York Municipality Spring Garden

and reviewing hazardous waste management and storage, it appears that additional work is involved with hazardous waste.

Recommendations:

- 1) Label all hazardous waste containers in accordance with regulations to accurately depict contents and accumulation date
- 2) manage all hazardous waste containers to prevent leaks
- 3) Close lids and bungs on hazardous waste containers
- 4) Prepare PLC plan in accordance with regulations
- 5) Prepare and conduct training program in accordance with regulations
- 6) Store hazardous waste containers in accordance with regulations as to distance from building
- 7) Repair cracks in containment system
- 8) Seal off square pit ~~and to be kept~~ located containment room where hazardous waste is being stored

Department received a letter from Cole Office Env (as requested) stating that the zinc-chrome electroplating operation was closed Nov 1982.

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Person Interviewed (signature) Copy mailed to Cole Office Env 10/10/89 Date 10/10/89
Inspector (signature) Theresa Alberici Date 10/10/89

COLE - Div LITTON
09 873 7794

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection

DATE: 6/6/85

FROM: Joseph S. Arena *JA*
Environmental Scientist (3HW11)

TO: File

Thru: Peter W. Schaul, Chief *PS*
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

I SPOKE WITH KEN BEARD - REG 3 INSPECTOR. HE SAID HE WAS PLANNING TO GO BACK ABOUT THE END OF JUNE REGARDING OTHER MATTERS AND WOULD CHECK ON THE CLASS II VIOLATIONS AT THAT TIME.

Joe A

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

Maj. Gen.

Date of inspection 4/4/85 Time start 9:00 Time finish 12:45
Name of inspector Kenneth P. Beard
Company, installation name Cole Div Litton Business Systems
Location 601 Leuchs Mill Rd
County York Municipality Spring Garden Twp
Identification number PAD 0987 37794
Name of responsible official Bruce Bowers
Title Mgr of Environmental Affairs
Mailing address 640 Whiteford Rd.
Area code and phone no. 717 - 854 - 1545
Name of person interviewed B. Bowers
Title Sgt
Mailing address (if different from above) Same
Area code and phone no. Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

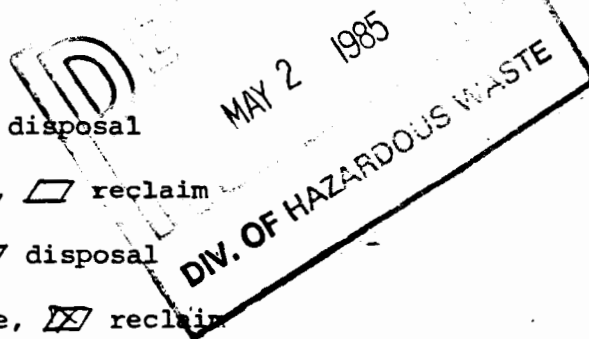
2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. 136,500 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

Nonhaz. Paint Sludge, D002 - Stripping Solution F006 - Zn plating sludge
D007 - Plating Rinse Water/sludge D001/U220 F005/U159
Solvent from paint line cleaning

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No



HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

4/4/85

C. L. M. P.

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS					REQUIREMENT	CHAPTER CITATION
1	2	3	4			
	2				Identification number	(c) (1)
	2				Hazardous waste shipments offered only to licensed transporters	(c) (4)
1					Authorization received from TSD facility for wastes shipped off-site	(d)
		3			PA manifest used for intrastate shipments	(e) (1)
	2				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (i)
	2				Manifests filled out properly and completely	(e) (1)
	2				Manifests routed properly and within time limits (24 hours)	(e) (2)
					Proper U.S. DOT shipping containers or packages	(f) (1)
	2				Shipping containers marked and labeled according to U.S. DOT	(f) (1) (i)
4/4/85	2				Containers of 110 gal. or less marked with required PA label	(f) (1) (i)
	2				Placards offered to transporter	(f) (2)
	2				Wastes accumulated on-site for less than 90 days	(g) (1)
1					Wastes stored in proper containers and properly marked and labeled	(g) (1) (i)
	2				Containers managed in accordance with 75.265(g)	(g) (1) (i)
1					Containers clearly marked with accumulation date and visible for inspection	(g) (1) (i)
					Records retained at designated location for 20 years	(h)
	2				Quarterly reports submitted to the Department	(i)
		3			Exception reporting procedures followed	(j)
		3			Hazardous waste disposal plan, if required	(l)
		3			Spill reporting procedures followed	(m) (1)
	2				Preparedness, Prevention and Contingency Plan ^{on-site approved} and implemented	(m) (5)
		3			Special requirements followed for international shipments	(o)
1					Inspection log maintained for weekly inspection of drum storage area	75264
					log includes proper labelling, closures in place, signs of leakage	(9)(5)(2)

Permit By Rule

Requirements

Chapter Citation

1 = compliance
2 = non compliance
3 = not applicable
4 = not determined

Compliance Status:
1 2 3 4

75.264(d)(2)(i)	Active portion has 24 hour surveillance.	1			
75.264(d)(2)(ii)	Artificial barrier surrounds active portion.	1			
75.264(d)(3)	Proper signs are posted.	1			
75.264(e)(2)(i)	Inspection schedule is on-site.	1			
75.264(e)(2)	Inspections are conducted as per inspection plan.	1			
75.264(e)(4)	Deterioration and/or malfunctions of equipment corrected as revealed by inspections.	1			
75.264(e)(4)	Immediate remedial action taken when a hazard is imminent or already present.				3
75.264(e)(5)	Inspection log is maintained and utilized properly.	1			
75.264(h)(2)(i)	Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	1			
75.264(h)(2)(ii)	Facility is capable of summoning outside emergency assistance.	1			
75.264(h)(2)(iii)	Facility is equipped with spill and decontamination control equipment.	1			
75.264(h)(3)	Facility communications and/or alarm systems and spill and decontamination control equipment is periodically tested and maintained.	1			
75.264(h)(6)	Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment.	1			
75.264(i)(9)	A copy of the PPC plan and all revisions to the plan is available at the facility.	1			
75.264(i)(6)	The contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	1			
75.264(i)(11)	One employee is designated as the primary emergency coordinator and is either on-site or on call at all times.	1			
264(k)(1)	Operating records are maintained at the facility. Records contain the following:	1			
75.264(k)(2)	Description and quantities of wastes treated and discharged under PBR.	1			
75.264(k)(2)(iii)	Results of waste analyses and trial tests performed under 264(g) or 265(y).				4
75.264(k)(2)(iv)	Summary reports and details of any incidents requiring implementation of the contingency plan.				3
75.264(k)(2)(v)	Results of all on-site inspections, including those outlined in 265(y)(6) below.	1			
75.264(m)(2)	Emissions, discharges, fires, explosions and groundwater contamination reported to the Department as required.				3
75.264(m)(3)	Records maintained under Section 264(k) are available to the Department.	1			
75.265(y)(2), (8), (9), (10), 75.265(g)	Special precautions are taken to prevent accidental ignition or reaction of hazardous wastes.	1			
75.265(y)(3)	Hazardous waste or treatment reagents are not placed in a treatment process or equipment if they could cause it to rupture, leak, corrode or otherwise fail.	1			
75.265(y)(4)	Continuously fed equipment is fitted with a means of stopping the inflow.	1			

Permit By Rule Requirements (cont'd)

[illegible]

HAZAR US WASTE INSPECTION REPORT
Part C - Comments

Date of Inspection 4/4/85 Identification Number PAD 098737794
Company, Installation Name Cole Div. Litton Business Systems Inc (LMB)
County York Municipality Spring Garden Twp.

Facility has PBR status

~~Drums~~ accumulated (< 90 days) in a "bermed" area, included wastes:
solvent (80% MEK, 20% toluene) - paint line flushing → Berkley Products
waste paint - nonhazardous → Waste Conversion, Hatfield
waste (phosphatizing) sludge - nonhazardous → Dupont, Deepwater NJ
waste oil from phosphatizing - non hazardous
Electroplating wastes and paint stripping (caustic) wastes treated
under PBR - Sludge taken to Fondessy. Accum. in a hopper*
Cardboard splattered with nonhazardous paint accumulated in
a roll-off → Fondessy (thin Del. Container)

Electroplating: Nickel and Chrome plating done on a barrel
line (small parts dipping) and an automatic line. Rinse
waters go to batch treatment in the basement & then
to treatment plant. (Batch treat ~~is~~ is Cr reduction w/ NaHCO_3)

Caustic paint stripping area is surrounded by a dike.
Material w/in dike conveyed to a drain which leads to
batch treatment tanks. (acid addition). Then routed to
wastewater treatment plant. Caustic solution in tanks is
allowed to evaporate & the sludge drummed for disposal
(after neutralizing w/ acid)

* stored under a roof (< 90 days)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) _____ Date _____

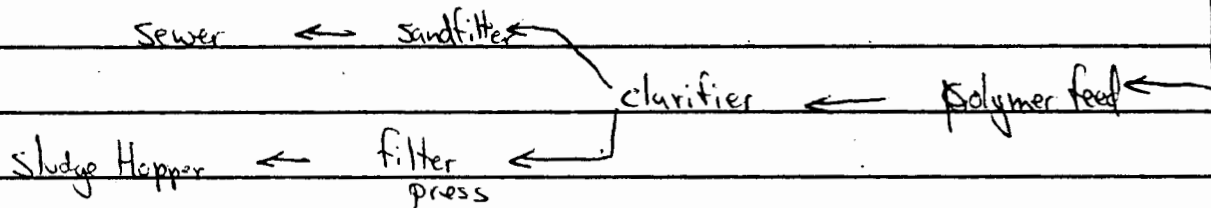
HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of Inspection 4/4/85 Identification Number PADO98737794
Company, Installation Name Cole (LNR) Div. Litton Business Systems Inc.
County York Municipality Spring Garden Twp

as a hazardous waste.

Wastewaters conveyed to wastewater treatment as a continuous feed (from batch treatment and additional rinsewater w/out batch treatment)

Treatment Scheme: \longrightarrow Equalization \longrightarrow pH Adjust (to 7.5 or 8.5) \longrightarrow pH Adjust (pH > 8.5)



Waste solvent generated in automatic paint spray booth from line flushing. Accumulated in 15 gallon pails. Pails emptied into 55 gal. drums daily - drum moved to drum storage at ~~least~~ least 1X/week.

Water curtain spray booth generates a nonhazardous (not EP Tox, no solvents) sludge \longrightarrow stabilized at Del. Containment, disposed @ Fondersey. Water-based paint utilized

Paint dip tanks contain paint w/ approx 2-3% solvent.

Hazardous waste determinations indicate that waste paint (generated when color change necessary) is not EP Toxic and has no solvents.

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Person Interviewed (signature) _____ Date _____
Inspector (signature) _____ Date _____

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of Inspection 4/4/85 Identification Number PAD098737794
Company, Installation Name Cole - Louch Mill Rd.
County York Municipality

Waste Paint disposed at ~~the~~ Waste Conversion.

Cole self-monitors* its discharge to the POTW. It is occasionally high in

Generally, the sewer authority has no problem w/ Cole's discharge. The pH adjustment tanks are continuously monitored w/ pH probe (cleaned daily, calibrated weekly) & recorded by strip chart - kept as part of operational record.

Non-compliance Items:

- ① No waste authorizations on file - will be obtained soon
- ② Inspection log kept, but needs to be expanded to include a check of pipe fittings & tank constructions at WWTP (weekly).
- ③ Drum storage area needs to be formally inspected and log kept. Weekly check for labeling, ~~status~~ closures, leaks is required.
- ④ Two solvent (waste) drums were unlabeled outside the painting area. This item will be quickly corrected.

* parameters are pH, PO₄, Cr, Fe, Al, Pb, Zn

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Person Interviewed (signature) Kenneth P. Beard

Date

Inspector (signature) Kenneth P. Beard

Date

4/23/85